

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 23-md-03084-CRB

Honorable Charles R. Breyer

This Document Relates to:

*Jaylynn Dean v. Uber Techs., Inc.*,  
N.D. Cal. No. 23-cv-06708  
D. Ariz. No. 25-cv-4276

**DECLARATION OF MAYA R. KALONIA IN  
SUPPORT OF PLAINTIFF'S STATEMENT  
REGARDING DEFENDANTS'  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE FILED  
UNDER SEAL**

UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA  
PHOENIX DIVISION

JAYLYNN DEAN,

Plaintiff,

v.

UBER TECHNOLOGIES, INC., et al.,

Defendants.

No. 25-cv-4276-PHX-CRB

Judge: Honorable Charles R. Breyer  
Ctrm.: 501

DECLARATION OF MAYA R. KALONIA ISO PLAINTIFF'S STATEMENT REGARDING DEFENDANTS'  
ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIAL SHOULD BE FILED  
UNDER SEAL

N.D. CAL. NO. 3:23-MD-03084; D. ARIZ. NO. 25-CV-4276

1 I, Maya R. Kalonia, declare:

2 1. I am an attorney in the law firm of Girard Sharp, LLP, and counsel for Plaintiffs in the  
3 above-captioned Multi-District Litigation. I am a member of the State Bar of California and am admitted to  
4 practice before this Court. I make this declaration based on my own personal knowledge. If called upon to  
5 testify, I could and would testify competently to the truth of the matters stated herein. I respectfully submit  
6 this declaration in support of Plaintiff's Statement in Support of Defendants' Administrative Motion to  
7 Consider Whether Another Party's Material Should be Filed Under Seal.

8 2. I have reviewed Defendants' Motion to Permit Evidence Under FRE 412 and Exhibits 1-4  
9 to the Declaration of Laura Vartain Horn filed at ECF Nos. 4824, 4824-2, 4824-3, 4824-4, and 4824-5,  
10 respectively.

11 3. Defendants' Motion includes intimate and sensitive aspects of Plaintiff's and third parties'  
12 personal lives, Plaintiff's medical history, and the names of third parties.

13 4. Exhibit 1 includes intimate and sensitive aspects of Plaintiff's and third parties' personal  
14 lives, Plaintiff's medical and mental health history, and the names of third parties.

15 5. Exhibit 2 includes intimate and sensitive aspects of Plaintiff's and third parties' personal  
16 lives.

17 6. Exhibit 3 includes the middle name and birth date of Plaintiff, information regarding  
18 substance abuse by Plaintiff and third parties, the intimate and sensitive aspects of Plaintiff's and third  
19 parties' personal lives, the names of third parties, the name of a bellwether plaintiff proceeding under  
20 pseudonym, and Plaintiff's medical and mental health history.

21 7. Exhibit 4 includes the intimate and sensitive aspects of Plaintiff's and third parties' personal  
22 lives and the names of third parties.

23 8. Disclosure of the identified information in Defendants' Motion and Exhibits 1-4 would  
24 cause significant privacy harms resulting in public humiliation, reputational damage, unwanted media  
25 attention, annoyance, and embarrassment.

26 9. The significant privacy concerns of Plaintiffs and third parties outweigh the public's  
27 minimal interest in knowing their identities or personal information. The public's interest in the case may

1 be satisfied without revealing this information.

2 10. There is no less restrictive alternative to sealing portions of Defendants' Motion and  
3 Exhibits that would protect the legitimate privacy interests of plaintiffs and third parties, as describing the  
4 information would reveal its contents. Plaintiff's request is narrowly tailored to seal only PII and highly  
5 sensitive information.

6 I declare under penalty of perjury that the foregoing is true and correct.

7 Executed on January 5, 2026 in San Francisco, California.

8  
9 /s/ Maya R. Kalonia

10 Maya R. Kalonia  
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